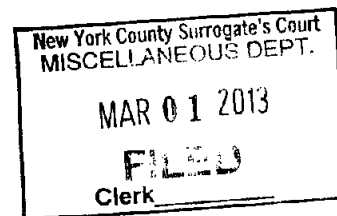


STATE OF NEW YORK
SURROGATE'S COURT: COUNTY OF NEW YORK

----- x
In the Matter of the Application of
ORLY GENDER, as a person interested, for the
removal of DALIA GENDER as Trustee of the
Orly Genger 1993 Trust pursuant to SCPA §711(11)
----- x

File No. 0017/2008



AFFIDAVIT OF JEREMY D. ANDERSON

STATE OF DELAWARE)
) ss.
COUNTY OF NEW CASTLE)

I, Jeremy D. Anderson, having been first duly sworn, hereby depose and say:

1. I am member of the Bar of the State of Delaware and am an attorney in the Delaware office of Fish & Richardson P.C.

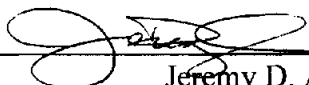
2. I represent Dalia Genger, as the Trustee of the Orly Genger 1993 Trust, in an action filed on October 4, 2011 in the Court of Chancery of the State of Delaware that is captioned *Dalia Genger, as Trustee of the Orly Genger 1993 Trust v. TR Investors LLC, et al.*, C.A. No. 69006-CS (the "Delaware Action").

3. On October 12, 2011 Defendant TPR Investment Associates, Inc. answered the Complaint.

4. On October 24, 2011, TR Investors, LLC, Glenclova Investment Co., New TR Equity I, LLC, New TR Equity II, LLC, and Trans-Resources, Inc. answered the Complaint and filed counterclaims and cross-claims.

5. Ms. Genger did not answer, move or otherwise respond to the counterclaims and cross-claims that were asserted because she and her attorneys were temporarily restrained from prosecuting the Delaware Action by the Supreme Court of New York.

6. If Ms. Genger is not further restrained or stayed from prosecuting the Delaware Action, she will answer, move or otherwise respond to the counterclaims and cross-claims, and will then work with the Defendants to submit to the Court of Chancery a Scheduling Stipulation and Order that governs the pre-trial proceedings in the Delaware Action (the "Scheduling Order"). The Scheduling Order will include, among other things, dates for the completion of discovery, case-dispositive motions and pre-trial briefing. The Delaware Action could proceed to trial within 8-12 months, and pursuant to Delaware law, the Delaware Court of Chancery would issue an opinion no later than 90 days after the completion of post-trial briefing.



Jeremy D. Anderson

Subscribed and sworn to before me this
27th day of February, 2013 by Jeremy D.
Anderson who is personally known to me.



Signature of Notary Public

Patricia H. Blazer
NOTARY PUBLIC, STATE OF DELAWARE
My Commission Expires April 11, 2014

PATRICIA H. BLAZER
NOTARY PUBLIC
STATE OF DELAWARE
My commission expires April 11, 2014

